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BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

U.S. TORONTO SERVICE PROCEEDING	:	Docket 50168

REBUTTAL EXHIBITS
OF
THE GEORGIA & ATLANTA PARTIES

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Dated: April 4, 1995

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U.S.-TORONTO SERVICE PROCEEDING
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Rebuttal Exhibits

NARRATIVE FOR REBUTTAL EXHIBITS OF THE GEORGIA & ATLANTA PARTIES

These Rebuttal Exhibits are filed by the Georgia & Atlanta Parties in response to the Direct Exhibits of Delta Air Lines, Inc. ("Delta"), Trans World Airlines, Inc. ("TWA"), Northwest Airlines, Inc. ("Northwest"), USAir, Inc. ("USAir"), and Continental Airlines, Inc. ("Continental") in the U.S.-Toronto Service Proceeding. The Exhibits make it even more clear that the Delta proposal for Atlanta-Toronto service is the best, providing more public benefits for more travellers and shippers than selection of any other applicant.

Two carriers have attempted to isolate their applications from the three others and have claimed that there must be a Toronto gateway selected from the states west of the Mississippi River. It is not altogether clear why that should be the case, particularly when both gateway candidate cities in these two proposals border the Mississippi, and thus just barely qualify as "west." This will be reviewed in Section 1. In Section 2, we will focus on the USAir proposal for Pittsburgh-Toronto service. Section 3 will cover the TWA proposal for St. Louis-Toronto service. Section 4 will cover Continental's proposed Newark-Toronto service. Section 5 will address Northwest's proposal for Minneapolis-Toronto service. Finally, in Section 6, we will focus again on the Delta proposal for Atlanta-Toronto service.

Section 1 - The Western Markets

Northwest and TWA have made much of the notion that the western states need more gateways to Toronto. Each has divided the country into two sections, split conveniently by the Mississippi River. Since each carrier has proposed a gateway located just immediately west of the River, that seems to qualify each city as a Western gateway. Conceptually, we have a problem with the notion that travellers to or from the western states must stop on their journey to or from Toronto in a city west of the Mississippi. It is clearly irrelevant to the traveller who must make at least one stop on a journey between the United States and Canada whether that one stop is on the left side or the right side of the Mississippi River? The only real concerns for such a traveller are timely arrival and minimal delay or waiting between flights. Circuity may be a passing intellectual curiosity, but is mostly irrelevant if the connection is good and convenient for the traveller's needs. Geographical proximity to the Mississippi River of a change of planes cannot possibly be on most travellers lists of concerns.

Section 2 - USAir-Pittsburgh

USAir proposes two daily Pittsburgh-Toronto flights for a city which already has four such daily flights and yet has 1993 CY O&D traffic of only 36 percent of Atlanta's, a city with no nonstop service to Toronto (ATL-R-201). In YE June 1994 data, Pittsburgh drops to only 34% of Atlanta O&D to Toronto. The Pittsburgh-Toronto local market is so small that USAir forecasts only 15,559 passengers, less than 20% of the Delta forecast for Atlanta-Toronto local traffic (ATL-R-202). USAir is proposing service to about 62 cities that currently have no nonstop service to Toronto. However, USAir can serve most of those cities via its Philadelphia-Toronto service, which operates four times daily. In fact, Delta has shown in the exemption proceeding that almost 75 percent of the USAir connecting passenger forecast has connections via Philadelphia. Of course, Pittsburgh could be added in to that, bringing the total percentage to more than 76 percent. While the OAG does not list the Pittsburgh-Philadelphia-Toronto connection, if a passenger needed to be at Toronto airport before noon, the connection would work, while the nonstops would not. Returning from Toronto, it is not as clear why you would make that extra connection, but it <u>is</u> there. The proposed USAir nonstop service would not get a traveller to Toronto before noon either!

USAir has forecast heavily in markets which already enjoy nonstop service to Toronto. Twenty-one such cities account for 41.6 percent of the forecast traffic (ATL-R-203). In contrast, only 8.8 percent of the Delta forecast is in markets that had nonstop service prior to the exemption proceeding. TWA and Northwest forecast 12.8% and 11 percent respectively in existing nonstop markets. Additionally, USAir forecast traffic in markets where its connections exceed two hours layover, very excessive on a flight to Canada. We believe that is unrealistic forecasting.

Section 3 - TWA-St. Louis

The TWA proposal for St. Louis-Toronto is on a much smaller scale than the Delta proposal for Atlanta-Toronto. The 1993 O&D traffic between St. Louis and Toronto is only 32 percent of the Atlanta-Toronto total. The TWA/St. Louis proposal would carry 58 percent of the local traffic of the Delta/Atlanta proposal (St. Louis-Toronto local O&D vs. Atlanta-Toronto). These totals, while showing St. Louis still much smaller than Atlanta, illustrate that TWA probably overforecast local St. Louis-Toronto traffic. (See ATL-R-301.) The forecast says that local St. Louis-Toronto traffic will be 62% more than 1993 O&D. No other applicant forecast even as much as the 1993 O&D for its gateway.

The St. Louis proposal again reflects small. Delta-Atlanta forecasts 77,709 more passengers than TWA-St. Louis. It forecasts 33,223 more local market passengers than TWA. The Delta hub at Atlanta is substantially bigger than TWA's hub at St. Louis. In fact, the Delta hub at Atlanta is the largest hub of any carrier anywhere in the world. Delta has 215 more daily departures at Atlanta than TWA at St. Louis. Delta enplanes almost 2 1/2 times the number of passengers at Atlanta of TWA at St. Louis. There are 50,283 more airplane seats available Daily at the Delta-Atlanta hub than at the TWA-St. Louis hub. For the Toronto service, Delta proposes 65,040 more seats annually than TWA. (See ATL-R-302.)

The TWA-St. Louis proposal and forecast is so tenuous that TWA forecast 4,900 interline within-Canada connecting passengers, something other applicants did not do in the exemption proceeding, but USAir & Northwest also did in this proceeding. The biggest problems for TWA appear to be the size of markets served by its proposal, and the fact that existing services overlap much of the traffic potential. Four large cities behind St. Louis already have nonstop service -- DFW, Houston, Los Angeles and San Francisco. Chicago-Toronto is served by two hub carriers -- American and United -- which draws the well-served midwest and west traffic base. Additionally, the Northwest service over Detroit accommodates passengers from the west and midwest. As we indicated previously, if you have to stop once on your way between the U.S. west and Toronto, it does not make much difference where the stop is, as long as it doesn't delay your trip.

Section 4 - Continental-Newark

Continental actually made two applications for new service to Toronto, and one (for Houston service) was uncontested. Thus, Continental cannot argue that it needs to be a new entrant by receiving Newark as an additional gateway. Further, Continental is clearly linked closely with the operator of six Toronto-Newark daily flights and eight more daily Toronto-LaGuardia services for the New York metropolitan area. Air Canada owns a very significant stake in Continental, and would no doubt place its code on all the connecting flights that Continental proposes in this proceeding. Thus, the travelling public will have access to the Continental system under an Air Canada designator code for all six daily (or more, if Air Canada offers them) Newark-Toronto services.

Awarding Continental its proposed Newark route would offer almost no public benefits. The coordinated connections at Newark will exist anyway, and that is the major public benefit to be added to Air Canada's Toronto-Newark services. There would be no intragateway competition between Air Canada and Continental at Newark, at Toronto, or beyond. The two carriers are partners, and the primary beneficiary of any award to Continental would appear to be Air Canada. Benefits to Air Canada should not be a goal of this proceeding.

Continental claims it is the only carrier with a major domestic hub in the East seeking its first hub access at Toronto. The Newark hub is less than 29 percent the size of Delta's Atlanta hub. (See ATL-R-401.) One could wonder whether Newark qualifies as a "major" hub at that level. However, the real problem with the Continental claim is that Delta does not have service to Toronto from the biggest airline hub in the world, Atlanta, which is clearly in the eastern half of the United States. Continental places Delta into the shoes of its commuter partners, Comair and Business Express to claim that Delta has Toronto service from Cincinnati and Boston. Absent applications in this proceeding, Delta would not be able to operate large plane services in either of those Toronto markets.

Like USAir, Continental forecast heavily in markets which already have nonstop service to Toronto. While Continental uses only 11 such markets in its forecast, 65.5 percent of the total forecast comes from those 11 markets. (*See* ATL-R-402.) We show the contrast to the Delta, Northwest and TWA forecasts on page two of ATL-R-402.

The Delta-Atlanta proposal is substantially superior to the Continental-Newark proposal in all respects. There should be little question in this comparison which gateway is the preferable one -- Atlanta is the city that needs the service and will serve the most passengers and the most underserved region to Toronto.

Section 5 - Northwest-Minneapolis

The Northwest proposal for Minneapolis-Toronto service, in large part duplicates its existing Detroit-Toronto service, which is available five times daily. Detroit is a larger hub than Minneapolis for Northwest, with 447 daily departures vs. 421 at Minneapolis. (DL-117). Even the alleged benefits of low circuity for western cities is duplicated by Northwest's existing Detroit-Toronto service. We looked at Table 1 from the Northwest Answer in the exemption proceeding, and at NW-604 and 608 in this proceeding. All eight of the top eight western markets have nonstop to nonstop connections via Detroit *and* seven have low circuity via Detroit (five of the eight even have *lower* circuity via Detroit). The other "largest western market" is Minneapolis itself, and that also has circuity below 10 percent and nonstop to nonstop Toronto connections via Detroit.

Of Northwest's 746,550 O&D 1993 passengers shown in NW-608, 652,050 have equal or better connections via Detroit. Only 94,500 remain, and these encompass a few markets. In several of those, the alleged low circuity benefits vanish for Northwest as well. There's really not much left.

Northwest's service proposal for Minneapolis does very little for the underserved southeast region. While Northwest has existing service over its larger midwest hub, Detroit, Northwest wants additional service via a second midwest hub, Minneapolis. Northwest should not receive service at the expense of Delta service from its much larger hub, Atlanta. (See ATL-R-502.)

Section 6 - Delta-Atlanta

Several of the applicants claimed extensive traffic in connecting markets which already have nonstop service. Two applicants (Continental and USAir) claimed traffic where connections exceeded two hours. We looked at 1993 O&D passengers in all connecting markets without any nonstop service to Toronto, and with under two hours connections, and compared the passengers served by each applicant. The result is ATL-R-601. It shows that Delta/Atlanta really serves more of the travelling public better than any other applicant.

We believe that the Delta/Atlanta proposal is a winner on all counts. Atlanta is the largest city in America without nonstop service to Toronto (absent the current exemption authority), has the most local O&D passengers of any U.S. city without nonstop service, and is the largest hub in the world.

The United States Government should place one of its two available new U.S.-Toronto routes in the hands of the carrier which will provide first nonstop service to America's largest city without such service and with the largest connecting complex in the world, so that the most potential travellers and shippers can reap the benefits. The difficult choice is who gets the second route. Delta/Atlanta is clearly number one.

EVEN WITH FOUR DAILY NONSTOPS TO TORONTO PITTSBURGH HAS ONLY 34-36 PERCENT OF THE TORONTO TRAFFIC OF ATLANTA WHICH HAS NO NONSTOP SERVICE (Rebuts US-301)

	1993 O&D Passengers	Atlanta More Than Pittsburgh	Pittsburgh as % of Atlanta
ATLANTA	**90,110**	**57,930**	
Pittsburgh	32,180		36%

	June 1994 YE O&D Passengers	Atlanta More Than Pittsburgh	Pittsburgh as % of Atlanta
ATLANTA	**90,440**	**59,320**	
Pittsburgh	31,120		34%

SOURCE: DL-108A; US-301

**USAIR FORECASTS
PITTSBURGH-TORONTO LOCAL TRAFFIC
AS LESS THAN 20 PERCENT OF
DELTA'S ATLANTA-TORONTO LOCAL TRAFFIC
(Rebuts US-301)**

Gateway/Carrier	Local Traffic Forecast	Atlanta More Than Pittsburgh	Pittsburgh as % of Atlanta
ATLANTA/DELTA	**79,453**	**63,894**	
Pittsburgh/USAir	15,559		19.6%

SOURCE: US-301; DL-301

MORE THAN 40% OF USAIR FORECAST IS FOR CITIES ALREADY HAVING NONSTOP SERVICE TO TORONTO (Rebuts US-301)

CITY WITH NONSTOP	FORECAST
Albany	134
Baltimore	1,032
Boston	1,703
Chicago	1,656
Cincinnati	456
Cleveland	2,969
Dallas	2,074
Detroit	987
Dayton	501
Hartford	2,188
Houston	566
Indianapolis	1,584
New York/Newark	4,844
Los Angeles	4,060
Miamni	2,706
Nashville	1,606
Philadelphia	2,635
Pittsburgh	15,559
San Francisco	2,021
Tampa	12,878
Washington, D.C.	1,073
Total	63,232

Total Forecast	151,923
Nonstop Cities	63,232
Percent of Forecast	41.6%

Source: US-301; OAG March 1995

**DELTA'S ATLANTA-TORONTO SERVICE
WILL BENEFIT MORE PASSENGERS
THAN THE PROPOSALS OF
CONTINENTAL, NORTHWEST, TWA OR USAIR
(Rebuts US-301)**

Applicant-Gateway	Forecast Passengers	Percent of Delta
DELTA-ATLANTA	**182,879**	**100%**
USAir-Pittsburgh	157,999	86.4%
Continental-Newark	126,032	68.9%
Northwest-Minneapolis	105,956	57.9%
TWA-St. Louis	105,170	57.5%

SOURCE: DL-301; US-301, CO-301, NW-301, TW-301

TWA LOCAL TRAFFIC FORECAST APPEARS EXCESSIVE
(Rebuts TW-301)

Gateway	O&D Base	Passenger Forecast	Forecast as % of O&D Base	Nonstops
St. Louis	28,520	46,230	162%	0
ATLANTA	**90,110**	**79,453**	**88.2%**	**0**
PIT	31,120	15,559	50%	4
MSP	51,290	18,096	35%	0
EWR	259,585	59,964	23%	21

SOURCE: TW-301; DL-301; NW-301; US-301; CO-301

TWA-ST. LOUIS IS A SMALL PROPOSAL COMPARED TO DELTA-ATLANTA

	Forecast Passengers	Amount Delta Greater	Local Toronto Passengers	Amount Delta Greater
DELTA-ATLANTA	**182,879**	**77,709**	**79,453**	**33,223**
TWA-St. Louis	105,170		46,230	

	Daily Seat Departures	Amount Delta Greater	Local O&D	Amount Atlanta Greater
DELTA-ATLANTA	**86,564**	**50,283**	**90,110**	**61,590**
TWA-St.Louis	36,281		28,520	

	Annual Seats	Amount Delta Greater	Markets Served	Amount Delta Greater
DELTA-ATLANTA	**257,760**	**75,040**	**139**	**38**
TWA-St. Louis	192,720		101	

	Total Daily Departures	Amount Delta Greater	Total Enplanements	Amount Delta Greater
DELTA-ATLANTA	**700**	**215**	**25,022,449**	**14,130,884**
TWA-St. Louis	485		10,891,565	

SOURCE: DL-301; DL-117; TW-301;
Official Airline Guide, January 1995,
Airline Seating Guide, U.S. Edition

ATLANTA IS MUCH LARGER THAN NEWARK AS AN AIRLINE HUB

	Total Daily Departures	Percent Newark of Atlanta
ATLANTA-DELTA	700	
Newark-Continental	201	28.7%

	Total Annual Enplanements	Percent Newark of Atlanta
ATLANTA-DELTA	25,022,449	
Newark-Continental	11,546,506	46.14%

	Markets Served	Percent Newark of Atlanta
ATLANTA-DELTA	139	
Newark-Continental	84	60.4%

	Average Daily Seats	Percent Newark of Atlanta
ATLANTA-DELTA	86,564	
Newark-Continental	29,966	34.6%

SOURCE: Official Airline Guide, January 1995
DOT Form 41, T3 Enplanement Statistics, YE September 1994
DL-R-112 in U.S.-Toronto Exemption Proceeding

MORE THAN 65% OF CONTINENTAL FORECAST IS FOR CITIES ALREADY HAVING NONSTOP SERVICE TO TORONTO
(Rebuts CO-301)

CITY WITH NONSTOP	FORECAST
Albany, NY	206
Baltimore, MD	562
Cleveland, OH	1,178
Dayton, OH	446
Hartford, CT	2,426
Houston, TX	672
Indianapolis, IN	483
Newark, NJ	9,964
Philadelphia, PA	1,238
Tampa, FL	4,768
Washington, DC	1,062
Total Nonstops	73,005
Total Forecast	111,688
Percent Nonstops of Forecast	65.4%

SOURCE: CO-301; OAG March 1995

MORE THAN 65% OF CONTINENTAL FORECAST IS FOR CITIES ALREADY HAVING STOP SERVICE TO TORONTO
(Rebuts CO-301)

Delta Forecast

Nonstop Markets	Forecast
Dallas/Fort Worth	3,275
Houston	575
Los Angeles	13,230
Total Nonstop Markets	16,080
Total Forecast	182,879
Percent in Nonstop Markets	8.8%

Northwest Forecast

Nonstop Markets	Forecast
Chicago	3,212
Dallas/Fort Worth	2,280
Detroit	1,565
Los Angeles	2,646
San Francisco	1,868
Total Nonstop Markets	11,571
Total Forecast (Non-interline)	104,831
Percent in Nonstop Markets	11%

TWA Forecast

Nonstop Markets	Forecast
Dallas/Fort Worth	2,350
Houston	486
Los Angeles	5,235
Nashville	978
San Francisco	3,791
Total Nonstop Markets	12,840
Total Forecast (Non-interline)	100,270
Percent in Nonstop Markets	12.8%

SOURCE: DL-301, NW-301, TW-301

NORTHWEST'S MINNEAPOLIS/ST. PAUL SERVICE AREA PRIMARILY DUPLICATES NORTHWEST'S DETROIT SERVICE AREA, PARTICULARLY IN LARGEST WESTERN MARKETS
(Rebuts NW-604, 608)

				"Circuity"		
Serial	Overall Rank	Origin City	O&D 1993	NW via MSP	NW via Detroit	Nonstop to Nonstop via Detroit
1	3	Los Angeles	247,580	1.8	0.6	Yes
2	7	San Francisco	171,040	0.5	1.5	Yes
3	13	Minneapolis	51,290	0.0	9.3	Yes
4	15	Phoenix	49,030	4.3	0.5	Yes
5	19	Denver	39,820	3.5	1.6	Yes
6	21	San Diego	32,030	2.6	0.6	Yes
7	22	Las Vegas	31,900	2.0	1.0	Yes
8	23	Seattle	29,360	1.0	3.9	Yes
		Total	652,050			

SOURCE: NW Table 1 in Answer in US-Toronto Exemption Proceeding; NW-604, 608; January 1995 OAG; March 1995 OAG

**DELTA'S ATLANTA HUB IS
LARGER THAN NORTHWEST'S
HUBS AT DETROIT & MINNEAPOLIS**

Carrier-Gateway	Flights Per Day	Percent of Delta	Nonstop to Toronto
DELTA-ATLANTA	**700**	**100%**	**No**
Northwest-Detroit	447	64%	Yes
Northwest-Minneapolis	421	60%	No

SOURCE: DL-117

**DELTA'S ATLANTA-TORONTO PROPOSAL
WOULD SERVE MORE CY 1993 TRAFFIC IN MARKETS
WITHOUT NONSTOP SERVICE TO TORONTO
THAN OTHER CANDIDATE PROPOSALS**

Carrier-Gateway	Service Area Minus Nonstop Markets O&D Base	DL exceeds by	DL% greater
DELTA-ATLANTA	**662,410**		
NW-Minneapolis	444,700	217,710	49.0%
TWA-St. Louis	364,040	298,370	82.0%
Continental-Newark	412,680	249,730	60.5%
USAir-Pittsburgh	592,660	59,750	10.1%

NOTES: In each case, we took the carrier forecast and total CY 1993 O&D shown (or, YE O&D through June 1994), and subtracted O&D numbers for cities in the forecast which already have nonstop service to Toronto or for which the projected layover in the gateway exceeds 2 hours on at least 2 routings and/or there is one 2 hour layover and no connecting flights shown on other segments. The remainder is shown in column 2 above.

The USAir traffic forecast includes traffic from more nonstop Toronto gateways (21) than any other carrier -- Albany, Baltimore, Boston, Chicago, Cincinnati, Cleveland, Detroit, DFW, Dayton, Hartford, Houston, Indianapolis, Los Angeles, Miami, Nashville, New York, Philadelphia, San Francisco, Tampa, Washington, D.C., and, of course, Pittsburgh.

SOURCE: DL-301; NW-301; TW-301; CO-301; US-301

1. The Delta calculation is as follows:

DL-301 CY 1993 total traffic for forecast cities = 1,041,190

Los Angeles	247,580	
DFW	102,130	
Houston	29,070	
	378,780	- 378,780
Service Area minus nonstop markets - to Column 2, p.1		662,410

2. The Northwest calculation is as follows:

NW-301 CY 1993 total traffic for forecast cities = 1,363,110

Chicago	321,150	
DFW	102,130	
Detroit	76,510	
Los Angeles	247,580	
San Francisco	171,040	
	918,410	- 918,410
Service Area minus nonstop markets - to Column 2, p.1		444,700

3. The TWA calculation is as follows:

TW 301 YE June 1994 total traffic for forecast cities = 959,170

DFW	108,920	
Houston	22,530	
Los Angeles	242,650	
Nashville	45,340	
San Francisco	175,690	
	595,130	- 595,130
Service Area minus nonstop markets - to Column 2, p.1		364,040

4. Continental calculation is as follows:

CO-301 CY 1993 total traffic for forecast cities =		1,459,035
New York	259,585	
Albany	1,780	
Baltimore	19,450	
Cleveland	50,990	
Dayton	3,860	
Ft. Myers*	17,660	
Hartford	21,000	
Houston	29,070	
Indianapolis	16,710	
Miami	217,660	
Philadelphia	107,190	
Phoenix*	49,030	
Tampa	206,400	
Washington	45,970	
	1,046,355	1,046,355
Service Area minus nonstop markets - to Column 2, p.1		412,680

* No connection is shown in one direction.

5. The USAir calculation is as follows:

US-301 CY 1993 total traffic for forecast cities = 3,512,130

Nonstops to Toronto Exist		Connecting Problems	
Albany	2,070	Allentown*	3,270
Baltimore	19,580	Atlanta*	90,440
Boston	213,410	Binghamton, NY*	90
Chicago	325,130	Burlington, VT*	1,310
Cincinnati	8,340	Charlotte*	19,900
Cleveland	52,910	Clarksburg*	320
Dallas	108,920	Cumberland*	150
Dayton	3,390	Elmira*	30
Detroit	81,870	Greensboro, NC*	8,330
Hartford	24,040	Hagerstown, MD*	340
Houston	22,530	Harrisburg, PA*	4,710
Indianapolis	15,520	Islip, NY*	990
LaGuardia/Newark	752,110	Lancaster, PA*	860
Los Angeles	242,650	Manchester, NH*	1,690
Miami	208,180	Morgantown, W VA*	160
Nashville	45,340	Newburgh, NY*	340
Philadelphia	111,630	Newport News*	770
Pittsburgh	31,120	Norfolk*	5,240
San Francisco	175,690	Oil City, PA*	30
Tampa	186,290	Portland, Maine*	4,720
Washington, DC	45,040	Providence, RI*	2,330
		Raleigh-Durham*	30,440
		Reading*	810
		Richmond*	7,230
		Roanoke*	1,770
		Sarasota*	9,040
		Scranton/Wilkes Barre*	1,810
		White Plains*	820
		Williamsport*	520
		Youngstown, OH*	210
			2,919,470

Service area minus nonstops & connecting problems 592,660

* Included because 2 or more connecting flights require a 2+ hour layover in Pittsburgh and/or have one 2 hour layover <u>and</u> are not even listed as conncting opportunities on 2 or more segments.

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April 4, 1995

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Re: U.S.-Toronto Service Proceeding, Docket 50168

Dear Ms. Adams:

Enclosed for filing are an original and eight copies of Rebuttal Exhibits of the Georgia & Atlanta Parties in the U.S.-Toronto Service Proceeding. Copies are being served this date on all parties on the Service List.

Please note that Counsel for the Georgia & Atlanta Parties has changed law firms, and thus the new address. We faxed this new address yesterday to all counsel for carriers to facilitate delivery of other rebuttal exhibits.

Respectfully submitted

Bill Alberger

Bill Alberger
Counsel to
The Georgia & Atlanta Parties

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was forwarded this 4th day of April, 1995 to all parties named on the attached service list.

Bill Alberger

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